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*Attorneys for Defendants
Computer Telephony Innovations, Inc.,
VoxTeleSys LLC, Patrick Burke, and Bruce Burke*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RICHARD M. ZELMA and NICOLE
ZELMA

Plaintiffs,

v.

PATRICK BURKE, individually; BRUCE
BURKE, individually, PATRICK BURKE,
as CEO of Computer Telephony Innovations,
Inc.; BRUCE BURKE, as Chairman and
Senior Officer of Computer Telephony
Innovations, Inc.; and COMPUTER
TELEPHONY INNOVATIONS, INC. d/b/a/
VOXTELESYS.COM

Defendants.

Civil Action No. 16-02559 (CCC) (MF)

Document electronically filed

**DEFENDANTS BRUCE BURKE
AND PATRICK BURKE'S
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION PURSUANT
TO FED. R. CIV. P. 12(b)(2) OR, IN THE
ALTERNATIVE, MOTION TO DISMISS
FOR FAILURE TO STATE A CLAIM
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

TO: Richard M. Zelma, *Pro se*
940 Blanch Avenue
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114 Fleetwood Road
Dumont, New Jersey 07628

COUNSEL:

PLEASE TAKE NOTICE that, on June 20, 2016, or a date and time to be set by the Court, Defendants Bruce Burke and Patrick Burke (collectively, "Defendants"), by and through their attorneys, Gibbons P.C., shall move for the entry of an order dismissing Plaintiffs'

Complaint for Lack of Personal Jurisdiction Pursuant to Fed. R. Civ. P. 12(b)(2) or, in the Alternative, Motion to Dismiss for Failure to State a Claim Pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Defendants shall rely upon the Brief in Support of the Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(2) or, in the Alternative, Motion to Dismiss for Failure to State a Claim Pursuant to Fed. R. Civ. P. 12(b)(6), and the Declarations of Bruce Burke and Patrick Burke, and upon the pleadings and all prior proceedings in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: May 27, 2016

By: s/ Michael R. McDonald, Esq.
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